

Exhibit 12

Maine Proposals

MDL 3047 – 2024-12-09 Agency Discovery JLB
Maine – Meta Proposal

Search Terms: Meta made its most recent proposal on December 9, 2024 to: Department of Education, Department of Health and Human Services, Division of Administration and Finance, the Governor’s Office. Meta agreed to de-prioritize the Department of Economic and Community Development. At a high level, Meta’s proposal involves using search combinations that require “Social Media Terms” or “Harm Terms” to occur “within 200” of one of the proposed “Youth Terms”.

Search Set 1 – Youth Use of Social Media	
1.	(“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
Search Set 2 – Youth Mental Health / Wellbeing Issues	
2.	(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR anxious* OR anxiety OR anxieties OR anti-anxi* OR depress* OR antidepress* OR reclus* OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR therapy OR therapies OR therapeutic OR counsel* OR treatment*) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
3.	(“pro-ana” OR “BMI” OR overweight OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
4.	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR extort OR exploit*) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under

MDL 3047 – 2024-12-09 Agency Discovery JLB
Maine – Meta Proposal

	13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
5.	(violen* OR abus* OR assault* OR altercation OR misbehav* OR misconduct* OR shoot* OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
6.	(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime staytime OR timespent OR “time spent” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
7.	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
8.	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
9.	(negative w/3 (appearance OR experience OR affect* OR effect*)) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
10.	(compar* w/5 (appearance OR social OR other* OR negative)) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18”

MDL 3047 – 2024-12-09 Agency Discovery JLB
Maine – Meta Proposal

	OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
11.	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
12.	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*)) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
13.	(Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
14.	(svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
15.	“ACE” OR “ACEs” OR “adverse childhood experience” OR “adverse childhood experiences”
	Search Set 3 – Other Case Issues
16.	(policy OR policies OR practice OR practices OR presentation OR assembl* OR initiative* OR interven* OR legislation OR legislate OR legislature OR legislations OR advocacy OR lobby* OR suspend* OR revok* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”) w/200 (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z”

MDL 3047 – 2024-12-09 Agency Discovery JLB
Maine – Meta Proposal

	OR “gen* alpha” OR gen-a* OR scholar* or School* OR student* OR pupil* OR grade*)
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MDL 3047 – 2024-12-09 Agency Discovery JLB
Maine – Meta Proposal

Custodians: Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (*) have been affirmatively proposed and agreed to by the Maine AG’s office during the course of the Parties’ negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Agency	Custodian	Title
Department of Administrative and Financial Services	Nicholas Marquis*	Chief Information Officer
Department of Administrative and Financial Services	Fred Brittain*	Former Chief Information Officer
Department of Administrative and Financial Services	Andy Smith*	Former Chief Information Officer
Department of Administrative and Financial Services	Jim Smith*	Former Chief Information Officer
Governor’s Office	Anna Hicks*	Office of Policy Innovation, Children’s Cabinet Coordinator
Governor’s Office	Timothy Feeley*	Deputy General Counsel
Governor’s Office	Scott Ogden*	Deputy Chief of Staff for Communications Strategy
Governor’s Office	Sarah Ward*	Director of Constituent Services
Department of Health and Human Services	Sheila Nelson*	Division of Disease Prevention, Adolescent Health and Injury Prevention Program Manager

MDL 3047 – 2024-12-09 Agency Discovery JLB
Maine – Meta Proposal

Agency	Custodian	Title
Department of Health and Human Services	Hayley Pawloski*	Division of Disease Prevention, Adolescent Health and Injury Prevention MIYHS Coordinator
Department of Health and Human Services	Mary Caron*	Division of Disease Prevention, Adolescent Health and Injury Prevention Suicide Prevention Coordinator
Department of Health and Human Services	Aaron Burke*	Division of Disease Prevention, Adolescent Health and Injury Prevention Suicide Grant Coordinator
Department of Health and Human Services	Elizabeth Palazzo*	Division of Disease Prevention, Tobacco and Substance Use Prevention Program Director
Department of Health and Human Services	Davide Pied*	Public Health Communications Senior Manager
Department of Health and Human Services	Rebecca Taylor*	Office of Data and Quality, Deputy Director
Department of Health and Human Services	Johanna Buzzell*	Office of Data and Quality, former Supervisor
Department of Health and Human Services	Jennifer Sedivy*	Office of Data and Quality, former Supervisor
Department of Health and Human Services	Abby Bridgers*	Office of Data and Quality, Data Analyst
Department of Health and Human Services	Julia Mason*	Office of Data and Quality, Statistician
Office of Behavioral Health,	Dean Bugaj*	Associate Director

MDL 3047 – 2024-12-09 Agency Discovery JLB
Maine – Meta Proposal

Agency	Custodian	Title
Child Behavioral Health Services		
Office of Behavioral Health, Child Behavioral Health Services	Ellie Larrabee*	Crisis Program Specialist
Department of Education	Julie A. Smyth*	School & Student Supports, Director
Department of Education	Carolyn Gross*	School & Student Supports, Health Consultant
Department of Education	Beth Lambert*	Chief Teaching and Learning Officer

CUSTODIANS

Department of Health and Human Services

For the Department of Health and Human Services (DHHS), the Maine Attorney General proposes custodians from three offices within DHHS: the Maine Center for Disease Control and Prevention (CDC), the Office of Aging and Disability Services (OADS), and the Office of Behavioral Health (OBH).

CDC

1. Sheila Nelson, Division of Disease Prevention, Adolescent Health and Injury Prevention, Health Program Manager
2. Hayley Pawloski, Division of Disease Prevention, Adolescent Health and Injury Prevention, MIYHS Coordinator
3. Mary Caron, Division of Disease Prevention, Adolescent Health and Injury Prevention, Suicide Prevention Coordinator
4. Aaron Burke, Division of Disease Prevention, Adolescent Health and Injury Prevention, Suicide Grant Coordinator
5. Elizabeth Palazzo, Division of Disease Prevention, Tobacco and Substance Use Prevention, Program Director
6. David Pied, Public Health Communications Senior Manager

OADS

7. Elizabeth Hopkins, Developmental Disability and Brain Injury, Associate Director
8. Lorrie Mitchell, Crisis Team Program Administrator
9. Angie Marquis, Crisis Team Program Administrator (former)
10. Karen Mason, Crisis Team Program Administrator (former)

OBH

11. Dean Bugaj, CBHS, Associate Director
12. Ellie Larrabee, CBHS, Crisis Program Specialist
13. Jessica Benson-Yang, Office of Data and Quality, Associate Director
14. Rebecca Taylor, Office of Data and Quality, Deputy Director (former)
15. Johanna Buzzell, Office of Data and Quality, Supervisor (former)
16. Abby Bridgers, Office of Data and Quality, Data Analyst
17. Julia Mason, Office of Data and Quality, Statistician
18. Jennifer Sedivy, Office of Data and Quality, Supervisor (former)

Governor's Office

For the Governor's office, the Maine Attorney General proposes as custodians staff responsible for legal, communications, and constituent services and the Children's Cabinet, a body within the Governor's Office of Policy Innovation and the Future that coordinates services

and programs directed toward the health and wellbeing of children across Maine's state government agencies.

19. Ana Hicks, Office of Policy Innovation and the Future, Human Services, Policy Director, Children's Cabinet Coordinator
20. Tim Feeley, Deputy General Counsel
21. Scott Ogden, Deputy Chief of Staff for Communications and Strategy
22. Sarah Ward, Director of Constituent Services

SEARCH TERMS

With respect to the custodians identified herein, the Maine Attorney General proposes to search for ESI using the following search terms and string:

(adolescen* OR child* OR minor* OR juvenile* OR kid* OR preteen* OR pre-teen* OR teen* OR tween* OR underage* OR under-age* OR young OR youth* OR student* OR (year* NEAR(2) old) OR (year* NEAR(2) age) OR "under 13" OR "under thirteen" OR "under 18" OR "under eighteen" OR "under 21" OR "under twenty-one" OR "under twenty one")

NEAR(7) (well-being OR wellbeing OR wellness OR wellness* OR "mental health" OR depress* OR anxiet* OR suicid* OR "self-harm" OR "compuls* use" OR misuse* OR misusing OR esteem OR self-esteem OR "self esteem" OR addict* OR "eating disorder" OR "eating disorders" OR dysmorphia OR bully* OR bullied OR "social comparison" OR insomnia OR ((sleep* NEAR(2) (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab*)) OR ("social media" OR platform* OR "SMP" OR Meta OR Facebook OR Instagram OR Snapchat OR Snap OR TikTok OR "Tik Tok" OR YouTube OR Twitter OR "X" OR Pinterest OR LinkedIn OR BeReal OR Lapse OR Reddit OR Threads OR VSCO OR Goodreads OR Quora OR Discord OR Twitch OR Tumblr OR filter*))

MAINE STATE AGENCY CUSTODIANS

Department of Administrative and Financial Services (DAFS)

<u>Nicholas Marquis</u> , CIO	NYFA
<u>Fred Brittain</u> , CIO (former)	NYFA
<u>Andy Smith</u> , CIO (former)	NYFA
<u>Jim Smith</u> , CIO (former)	NYFA

Governor's Office

<u>Ana Hicks</u> , Office of Policy Innovation, Children's Cabinet Coordinator	NYFA
<u>Tim Feeley</u> , Deputy General Counsel	NYFA
<u>Scott Ogden</u> , Deputy Chief of Staff for Communications and Strategy	NYFA
<u>Sarah Ward</u> , Director of Constituent Services	NYFA

Department of Health and Human Services (DHHS)

Maine Center for Disease Control (Maine CDC)

<u>Sheila Nelson</u> , Division of Disease Prevention, Adolescent Health and Injury Prevention, Health Program Manager	YFA
<u>Hayley Pawloski</u> , Division of Disease Prevention, Adolescent Health and Injury Prevention, MIYHS Coordinator	YFA
<u>Mary Caron</u> , Division of Disease Prevention, Adolescent Health and Injury Prevention, Suicide Prevention Coordinator	YFA
<u>Aaron Burke</u> , Division of Disease Prevention, Adolescent Health and Injury Prevention, Suicide Grant Coordinator	YFA
<u>Elizabeth Palazzo</u> , Division of Disease Prevention, Tobacco and Substance Use Prevention, Program Director	NYFA
<u>David Pied</u> , Public Health Communications Senior Manager	NYFA

Office of Behavioral Health (OBH), Child Behavioral Health Services (CBHS)

<u>Dean Bugaj</u> , Associate Director	YFA
<u>Ellie Larrabee</u> , Crisis Program Specialist	YFA

Office of Data and Quality

<u>Jessica Benson-Yang</u> , Associate Director	NYFA
<u>Rebecca Taylor</u> , Deputy Director (former)	NYFA
<u>Johanna Buzzell</u> , Supervisor (former)	NYFA
<u>Jennifer Sedivy</u> , Supervisor (former)	NYFA
<u>Abby Bridgers</u> , Data Analyst	NYFA
<u>Julia Mason</u> , Statistician	NYFA

Department of Education (DOE)

<u>Julie A. Smyth</u> , School & Student Supports, Director	YFA
<u>Carolyn Gross</u> , School & Student Supports, Health Consultant	YFA
<u>Beth Lambert</u> , Chief Teaching and Learning Officer	YFA